

This correspondence contains comments on Petition No. RM-10809 submitted by the Puerto Rico Amateur Radio League (PRARL) and received by the Commission on September 11, 2003. With this petition, the PRARL is asking the Commission to no longer require demonstrated ability in Morse code--the "CW requirement"--to obtain an amateur radio license with operating privileges in the high-frequency amateur bands. It also includes requests to revise Part 97 regarding exam preparation and retesting.

Although I favor the complete removal of the CW requirement for any amateur radio license, I would find the adoption of the proposed licensing requirements in this petition to be an acceptable compromise. I certainly support the request to increase the level of difficulty in the exams, with emphasis on digit-mode communication. Relegating exam preparation to the Commission and imposing a mandatory waiting period for retesting after failing an exam element are also reasonable proposals, but unless Commission personnel, particularly those engaged in enforcement, feel these changes are necessary, I see little point in adopting them.

Although it is customary to restrict a single submission of comments to a specific petition, in this case I offer general comments regarding the CW requirement given that during the past two months the Commission has offered thirteen petitions for public comment.

Generally, petitioners have offered several reasons for retaining the CW requirement, most notably, the simplicity of CW equipment, reliability in low signal-to-noise ratio conditions (useful for emergency communication), and the maintenance of tradition. Although, to a varying degree, all of these are true, none are compelling enough to impose a testing requirement. Indeed, if they are true, these reasons should stand on their own merit, and anyone supporting the CW requirement should have no cause to fear Morse code becoming a lost art if the requirement is removed.

To determine if the CW requirement is still necessary, it is instructive to examine why it was put in place to begin with. In the early part of the 20-th century when CW was the only mode of radio communication, knowledge of Morse code was a reasonable requirement for an amateur radio license. It also yielded an ancillary benefit: a talent pool from which skilled radio operators were either recruited or drafted for military service. Today, other modulation schemes are used by the telecommunication services, leaving CW operation largely confined to the Amateur Radio Service, mostly as a pastime. The military no long needs legions of radio-teletype operators. Thus, if the CW requirement is removed, it will be of no consequence to the commercial and military radio services. Furthermore, there is no reason to believe that chaos will ensue on the amateur bands as long as reasonable testing standards are maintained.

Finally, while I applaud the Commission for providing this opportunity to submit comments, more petitions on this issue will surely be submitted in the future, making it possible to repeatedly issue calls for comments and indefinitely delay any hard decision. This would be unproductive. Therefore, like the petitioners who submitted RM-10809, I encourage the Commission to move quickly on this matter and issue a Notice of Proposed Rulemaking as soon as practically possible.

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